

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**
Philadelphia Division

IN RE: Michael Joseph Borek	Case No. 25-10528-amc Chapter 13
Rocket Mortgage, LLC f/k/a Quicken Loans, LLC, Movant	
vs.	
Michael Joseph Borek , Debtor	

**OBJECTION TO CONFIRMATION
OF DEBTOR'S CHAPTER 13 PLAN**

Rocket Mortgage, LLC f/k/a Quicken Loans, LLC ("Movant"), by and through its undersigned counsel, files this *Objection to Confirmation of Debtor's Chapter 13 Plan* (Doc 3), and states as follows:

1. The Debtor filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on February 7, 2025.
2. Movant holds a security interest in the Debtor's real property located at 128 Ridgeway Ave, Norwood, PA 19074 (the "Property"), by virtue of a Mortgage.
3. The Debtor filed a Chapter 13 Plan (the "Plan") on February 7, 2025 (Doc 3).
4. Although Movant has not yet filed its proof of claim, it is anticipated that the claim will show the pre-petition arrearage due Movant is \$2,254.39, whereas the Plan proposes to pay only \$0.00.
5. Therefore, the Plan is not in compliance with the requirements of 11 U.S.C. §§ 1322(b)(3) and 1325(a)(5) and cannot be confirmed.

WHEREFORE, Movant respectfully requests the entry of an Order which denies confirmation of the Plan unless such plan is amended to overcome the objections of Movant as stated herein, and for such other and further relief as the Court may deem just and proper.

/s/Mario Hanyon

Andrew Spivack, PA Bar No. 84439

Matthew Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

Jay Jones, PA Bar No. 86657

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CERTIFICATE OF SERVICE

I, the undersigned, certify that on February 21, 2025, I did cause a true and correct copy of the documents described below to be served on the parties listed on the mailing list exhibit, a copy of which is attached and incorporated as if fully set forth herein, by the means indicated and to all parties registered with the Clerk to receive electronic notice via the CM/ECF system:

- OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN

I certify under penalty of perjury that the above document was sent using the mode of service indicated.

Date: February 21, 2025

/s/Mario Hanyon
Andrew Spivack, PA Bar No. 84439
Matthew Fissel, PA Bar No. 314567
Mario Hanyon, PA Bar No. 203993
Ryan Starks, PA Bar No. 330002
Jay Jones, PA Bar No. 86657
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Mailing List Exhibit: (Check all that apply. If via e-mail, include e-mail address. Continue to the next page if necessary.)

Michael A Cibik, Debtor's Attorney
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Debtor's Attorney

Via: ☒ CM/ECF ☐ 1st Class Mail ☐ Certified Mail ☐ e-mail:
☐ Other:

SCOTT F. WATERMAN [Chapter 13],
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Suite 100
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Bankruptcy Trustee

Via: ☒ CM/ECF ☐ 1st Class Mail ☐ Certified Mail ☐ e-mail:
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Michael Joseph Borek
128 Ridgeway Ave
Norwood, PA 19074
Debtor

Via: ☐ CM/ECF ☒ 1st Class Mail ☐ Certified Mail ☐ e-mail:
☐ Other: